

HELP for Dates and Deadlines

Alison Hall, Compliance Inspector

Tank owners and operators need to keep track of what part of their UST system must be tested and when the tests are due. During my inspections, I find systems that are overdue for tests. In some cases, the owner has lost track of time or what was needed. In other cases, the owner simply put off the testing until it was too late to get the test done on time. Here is a list of testing requirements that are tied to dates:

- Line Leak Detector function check: yearly
 - Sump Sensor function check: yearly
 - Line Tightness Test: yearly (for pressurized systems)
 - Line Tightness Test: every 3 years (for American Suction systems)
 - Tank Tightness Test: at the start of Inventory Control, 5 years thereafter, and at the end of the allowable 10 years for Inventory Control (same for Manual Tank Gauging)
 - Cathodic Protection Resurvey: every 3 years, or within 6 months after repairs
 - Rectifier Log Check: every 60 days
- "Yearly" means within a year of the previous test (at least once ev-

ery 365 days). It is important to remember that testing deadlines are on or before dates. For example, if a yearly test was done on 6/1/03 and new testing was done on 6/3/04, the facility is not in compliance. Not being in compliance can jeopardize coverage under SUPERB if a release occurs. Noncompliance also exposes the owner to civil penalties.

The Compliance Section recently began to send reminder post cards to owners 60 to 90 days before the next inspection. An important feature of this card is that it will also remind you of due dates for the next tests at your facility. This reminder is based on the best available information on file with the Compliance Section. If you have a question about the test dates on the post card, call the Compliance Help Desk at (803) 896-6240. We can help you get your dates straight. Your inspector will still call you a week to ten days before the inspection.

Besides keeping track of test dates, you must also keep track of deadlines for changes to the system. Here are two examples:

- December 22, 2008, is the FINAL

deadline for the use of Inventory Control for leak detection in South Carolina. Many owners, however, must stop using Inventory Control before that date. When your tanks were installed or upgraded to meet the new tank standards, a ten-year clock started. When your particular ten year period is over, you must begin to use another method for leak detection. Your inspector can help you determine when you have to switch to another method or you may call the Compliance Help Desk.

- December 22, 2018, is the deadline to upgrade tank systems to a double-walled system IF the tank system is within 100 feet of an existing water supply well, a coastal zone critical area or state navigable waters. Note: Tank systems in this category that were installed after May 23, 1997, are already double-walled. Again, you may call the Compliance Help Desk for more information.

Our compliance team wants YOU to be in compliance. We are available to answer your questions or offer tips to make your job easier. Use us.



Newsletter printed on recycled paper.

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TANK DOCTOR

Leslie Yasinsac, Compliance Inspector

When I am doing Inventory Control, if the "Total Gallons Over or Short" is a negative number, is it always smaller than the "Leak Check" value, since that is always positive?

That's a good question. From a mathematical standpoint, a negative value for "Total Gallons Over or Short" is smaller than any "Leak Check" value. But, the rules for doing inventory control tell us to use the "Total Gallons Over or Short" as a positive value when we compare it with the "Leak Check" value. If the "Total Gallons Over or Short" value is larger than the "Leak Check" value for one month, you may have a problem. At this point, you should check your math, check delivery and sales entries for each day, and make sure you are using good technique when "sticking" the tank. If a tank fails the leak check two months in a row, you must call the Program

at (803) 896-6240, or 1-800-826-5435. A tank that fails the leak check two months in a row will need to be precision tested by a testing company. If you are having trouble making inventory control work for you, give us a call at one of the above numbers.

Sometimes my monthly monitoring system gives a positive leak rate and calls it a fail. Since a positive leak rate means that no fuel is being lost, why is that a problem?

One thing you and I know for sure is that your tank is not manufacturing product. A measured increase may mean that water is getting into the tank. This would certainly increase the volume of liquid in the tank. Any hole where water can enter a tank is also a hole where fuel can leave, leading to a release. Large variations in the data may also be a reason for a failing

result. If the data is bad or widely variable, the method cannot accurately analyze the data and may automatically fail the tank.

When your release detection method reports a failure, you have a responsibility to do two things quickly. The first is to report the failure to the UST Program at (803) 896-6240 or within SC, 1-800-826-5435. Your other responsibility is to investigate why the failure occurred and to rule out the possibility that a release has occurred or is ongoing. The failure may be because the tank is leaking; however, it may also be because the monitoring method is not getting good information. A probe or tank monitor may have been struck by lightning; a tank stick may be missing the "button" on the end; the tank chart might not match the tank being monitored. When you report the failure to us, we can help you take the right steps to investigate the problem.

Help Us Help You! Things You Can Do To Prevent Delays During Cleanup.

Alex Butler, Assessment & Corrective Action Division

When there is a release from a UST, we all want it cleaned up as quickly as possible. Here are some things owners/operators can do to keep the process moving.

1. Choose, but choose wisely. Choosing a contractor is one of the first things that you will be asked to do, and it is one of the most important. You should choose a contractor certified by DHEC. The list of certified contractors is available on the DHEC web site (<http://www.scdhec.com/ust/>) or you may call us at (803) 896-6240 and request a list be mailed

to you. Remember that you, not your contractor, are responsible for having work completed properly and submitted on time. If your contractor does not perform properly, you can choose a different contractor for future work.

2. Be involved. Review all the papers you receive from the UST Program. If you do not understand something, call your DHEC project manager. Keep up with due dates, and make sure your reports are in on time. Make sure your contractor is aware of all deadlines. If you do not wish to be this involved, and the release has

been qualified for SUPERB funding, you may choose the State Lead option once your deductible is met. State Lead means that UST Program staff will handle the coordination with the cleanup contractor, including reminding the contractor of due dates for activity reports.

3. Talk to your neighbors. One of the most frequent causes of delay is obtaining access to adjacent properties. This delay can often be avoided if you keep your neighbors informed. Make sure that your contractor lets you know if they have problems getting

permission to enter adjacent property when it is necessary. Often, a phone call from you is all it takes to gain access.

4. Protect your wells. The damage, destruction and disappearance of monitoring wells and other site equipment will slow down the assessment and cleanup process and can cost you money. If the site is being repaved, wells can often be raised to avoid having to replace them. If you notice damage to one of your monitoring wells,

report it to the DHEC project manager. Try not to cover monitoring wells with heavy objects or debris that will prevent access for sampling. Remember that the SUPERB Account cannot pay to replace destroyed or lost wells, unless the damage is a result of normal wear and tear.

5. Keep it clean. The surest way to slow down the assessment and cleanup at a LUST site is by having an additional release. Develop and practice good operating and maintenance

habits to stay in compliance with the rules about release prevention and release detection.

In summary, we encourage an ongoing dialogue between tank owner/operator and the contractor. The program staff is ready to help by answering any questions about cleanup activities. We are also ready to look into any concerns you may have about the process.

Just what does a tank inspector do?

Leslie Yasinsac, Compliance Inspector

I get this question, or some version of it, a lot. The main part of my job is to check the equipment and records at facilities that have regulated underground storage tanks. The locations are as varied as gas stations, trucking companies, hospitals, colleges, city offices, county offices, military bases, and state agencies—even DHEC! We try to inspect each facility at least once every 12 to 14 months.

Inspectors verify that the facility has the right equipment to prevent leaks (tanks and piping installed correctly, spill prevention, overfill prevention and corrosion protection). We also check the procedures and equipment used to detect leaks quickly should one occur (release detection for tanks, release detection for piping, and automatic line leak detectors for pressurized piping). We make sure our records correctly identify the owner, operator, and supplier, as well as noting other

systems that may impact the environment such as aboveground storage tanks, vapor recovery information, and water well locations.

During our inspections, we try to ensure that the people operating the facility (whether owner, operator, manager or clerk) have enough information to stay in compliance and prevent and detect releases. We teach tank operations and maintenance "best" practices at each facility. We also conduct special training sessions for individual owners and groups of owners and operators. To schedule a session for your staff or group, call the Compliance Help Desk at (803) 896-6240.

Outside our normal inspection routine, we also inspect tanks being installed or closed and respond to citizen questions or complaints about operating facilities and facilities that are no longer in operation. Sometimes we are asked to gather data in response

to national tank issues like dispenser leaks, spill bucket failures, corrosion protection, or flexible piping. Currently, we are surveying the active corrosion protection systems within the state to determine if the systems are working like they should.

We also support the Assessment and Corrective Action Division of our Program by verifying equipment installations and posting public notices during clean-up. Finally, each inspector has an individual project. Right now, most of the projects focus on ways we can help you stay in compliance. We're trying several different new tools and will choose the ones that seem to work best. Whew! If we sound busy, we are. We are busy promoting and protecting public health and the environment by helping underground storage tank operations in South Carolina be the best that they can be.

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Environmental Excellence Award Winners 3rd Quarter 2004

This quarter, the Underground Storage Tank Program is proud to announce Environmental Excellence Award winners in 3 categories.

Wilco Fuel Plaza 925 in Greenville, owned by Wilcohes LLC, is the winner in the category of large retail operation (more than 3 facilities). Inspector Gwen Taylor states, "This company is very conscientious about being in compliance and maintaining their equipment."

For small retail operation, the award goes to **Ashley Enterprises in Charleston**. Inspector Andy Ruocco states, "This facility always has organized records and is well prepared for the inspection."

Santee Cooper's location in **Myrtle Beach** is the winner for non-retail operations. Tanitra Marshall, the local inspector, says, "The operator is present to assist with the inspection process."

Congratulations to our winners and to other nominees this quarter:

- Choice Cut Meats in Allendale
- Thomas & Howard in Columbia
- Fat Boys Express in Sumter
- SC Army National Guard OMS in Florence
- Elliott Exxon in Rock Hill
- City of West Columbia's Maintenance Shop

Thank you for your efforts to protect our environment.

Late Breaking News - Spill Alert!

Spill Prevention Failures

Our inspection staff is spotting spill buckets that have failed (are leaking). Have you checked yours?

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Return Service Requested